Angela Nails, Plaintiff.

Vs.

RECEIVED

Case Number

Dale county Sheriff Department

Sheriff Willie Olsan,

Sheriff Deputy Barann ElmoreDEBRA P. HACKETT, CLK Sheriff Employee Pam. U.S. DISTRICT COURT P.B. Mclauchlin.

MIDDLE DISTRICT ALA

2022 DEC 23

DEBRA P. HACKI U.S. DISTRICT COURT MIDDLE DISTRICTALA

Defendants,

1:22-W-00717-RAH 5mo

# **COMPLAINT**

The Plaintiff property was taken out of the Plaintiff apartment at 50 Small Street Apartment 17 Napier Field, Alabama 36303. The Dale County Sheriff Department removed the Plaintiff property from 50 Small Street Apartment 17 Napier Field, Alabama 36303 on August 12, 2011. The Dale County Sheriff Department Unlawfully removed the Plaintiff property under the Alabama Code Evection Law . The Alabama Evection Law states that the Alabama Sheriff Department must not delay in service of writ of possession on a resident. The Dale County Sheriff Department was sent the Order for writ of possession on July 11, 2011 allowing the writ of possession to delay 31 days after receiving the writ of possession. The Middle District Court in 1985 order that the Alabama Sheriff Department take special care of evection writ of possession in allowing the tenants to be able to contact the Alabama Sheriff Department within seven days to discuss the tenant property from not being removed before any property can be removed from the tenant resident. The Defendant did not allow the Plaintiff any time to contact the Dale County Sheriff Department within the seven days stated on the writ of possession to contact the Dale County Sheriff Department. Due the Plaintiff due process error of Civil Rule of Procedure not being use because of the error made the Dale County Sherriff Department is held responsible for not allowing the due process rights of the Plaintiff to be successful in working. And because the Defendant processes the writ of Possession with delay the Plaintiff is seeking damages.

# DAMAGES

The Plaintiff is seeking damages in the amount of 20,000.000.00 thirty million dollars from the State of Alabama, the Dale County Sherriff Department, Sherriff Wallie Olsen, Deputy Elmore and employee of the Dale County Sherriff Department Pam. The damages the Plaintiff is seeking:

- (1)Emotional Distress
- (2) Harassment of the Plaintiff rights of the Dale County Sherriff Department delay in service of writ of possession.
- (3) Wrongful removal of Plaintiff belonging/property
- (4) Injury to the Plaintiff stressful knowledge of not understanding the process was not Properly use to maintain peace of the surroundings and environment of the Plaintiff Resident.
- (5) Plaintiff property had to be replace because of the illegal evection from the Dale County Sheriff Department.
- (6) Unsatisfactory response of the wrong doing of the employees of the Dale County

  Sherriff Department when speaking to the Dale County Sherriff Wallie Olson about

  Employee's unlawful evection of the Plaintiff belonging/property.

- Page 3 of 8
- (7) Sherriff Wallie Olsen understanding of the unlawful evection of the Plaintiff belonging/property willingness not to do anything to the employees of the Dale County Sherriff Department such has loss of pay and replacement and loss of the Employees job to include Sherriff Wallie Olsan, Deputy Elmore and Sheriff Employee Pam.
- (8) The Dale County Sherriff Department un willness to be helpful in finding a resolution to reconcile the Plaintiff situation with the Alabama codes, rules and Alabama laws which governor the Plaintiff rights of due process when being Wrongfully evicted.
- (9) The discrimnation of tenants' rights of residing inside the tenant apartment until There has been an hearing within seven days from the date notice to move was given from the Alabama Sheriff Department.
- (10) The Plaintiff rights as an Alabama tenant were refused the Dale County Sheriff Department refused the Plaintiff rights to having a place to live and store the the Plaintiff belonging/property.

## DEFENDANT MAILING ADDRESS

The Defendant address is Dale County Sherriff Department 100 Court Square Ozark, Alabama 36360. The telephone number is (334) 774-2355.

# IN THE NORTHERN DISTICT COURT OF ALABMA

Angela Nails,
Plaintiff,
Vs.
Dale County Sheriff,
Defendant,

Case Number

## ADMINSTRATIVE RESPOISBILITY ERROR

The Defendant on August 12, 2011. Belonging were taken from the property the Plaintiff rented. The Plaintiff was out of town when coming back the Plaintiff had no belonging inside the Plaintiff resident. The Defendant had no rights to have taken the Plaintiff property out of the resident at 50 Small Street Apartment 17 Napier Field, Alabama 36303. The Circuit Court denied signing the document and giving the document to the Defendant. The Circuit Court order a stay of the Plaintiff and no person could take the property of the Plaintiff. The Defendant had no rights to the documents from the Circuit Court of Dale County in Ozark, Alabama without checking to know if the Plaintiff case was at the appeal level. The appeal level does not allow the Defendant to have any rights to others property.

#### JURISDICTION

The Plaintiff resident is in the Jurisdiction of the state of Missouri the Defendant is not a resident. The Plaintiff is filing against the Defendant as the complaint who is living in the state the complaint is filed were the Plaintiff lives.

#### **DAMAGES**

The Plaintiff damages come from the total amount of property which was taken from the Plaintiff resident. Also the amount of punitive and compensation damages the Defendant owes to the Plaintiff because of the selfish behavior of how the property was removed without following the guidelines to allow the Plaintiff to her day in court before the Circuit Court Judge

# <u>DAMAGES</u>

The Plaintiff damages are \$230,000,00.00 for the problems the defendants have cause the Plaintiff the lose of the Plaintiff property without the permission of the Plaintiff or without a legal document with information and resources adopted by the legal system to allow the property to be taken by use of crawling inside of the front window of the apartment, The screen pulled back and the window open by force by the entrance front window. The Plaintiff documents to not have property not taken was clearly stated in a Court Order signed by the legal system judge with a warning not to take any property and if any property taken should be put back the defendant dismissed the Order of a legal system judge and followed their false documents in hand that had no legal barring at the time and after the date of the removal of the Plaintiff property loss. The items lost were designer clothing the Plaintiff design under the name of MAT wear published marking belonging to the Plaintiff the damages amount more than seventy-five percent of the damages is for loss of designer clothing and personal items inside of the rented property. The twenty-five percent are punitive damages and compensation damages for the suffering of lose of the Plaintiff property and time spent to go before the court to fight for the order not to remove any of the property belongings of the Plaintiff. The Plaintiff prays for all the defendants to be punished under the laws allowed for the behavior of the Plaintiff United States Constitution.

#### DEFENDANT SERVICE ADDRESS

Defendant Dale County Sheriff Department address 113 West Reynolds Street Ozark, Alabama 36360.

Defendant Sheriff Willie Olson address 113 West Reynolds Street Ozark, Alabama 36360.

Defendant Sheriff Deputy Baran Elmore address 113 West Reynolds Street Ozark,

Alabama 36360.

Defendant Sheriff Employee Pam address 113 West Reynolds Street Ozark,

Alabama 36360.

Defendant P.B. McLauchlin address 100 East Court Square Ozark,

Alabama 36360.

ANGELA NAILS 10708 EGMONT ROAD SAVANNAH, GEORIGA 31406

# NOTICE OF SERVICE

The Plaintiff used United States Mail November 29 2022 to mail the complaint

To the United States District Court Clerk's Office address 155 Street Joseph Street Mobile,

Alabama 36602.

Dec 1, 2022 marled

ANGELA NAILS 10708 EGMONT ROAD SAVANNAH, GEORIGA 31406 Case 1:22-cv-00717-RAH-SMD Document 1 Filed 12/23/22 Page 8 of 8

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Lour L Clerk'S ODICE One Church Street, 13110 Montgomery, Mabama 36104